

EXHIBIT Q

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
JAA DOE,

Plaintiff,

-against-

NEIL PORTNOW; NATIONAL ACADEMY OF
RECORDING ARTS & SCIENCES, INC.; and
DOES 1-5 whose identities are unknown to
Plaintiff,

Defendants.
-----X

____ Civ. _____

**Declaration of Shonda Grant
In Support of Defendant's Notice of Removal**

I, Shonda Grant, declare, pursuant to 28 U.S.C. § 1746, and under penalty of perjury that the following is true and correct:

1. I am the Chief People & Culture Officer of Defendant National Academy of Recording Arts & Sciences, Inc. ("Defendant" or "the Recording Academy"). I am fully familiar with all of the facts stated herein and make this Declaration on personal knowledge except where otherwise noted.

2. The Recording Academy is incorporated in the State of Delaware.

3. The Recording Academy is a 501(c)(6) not-for-profit professional membership organization that for more than sixty years has represented the individuals who contribute to the creation and exploitation of recorded music, including recording artists, musicians, songwriters, and record producers. The Recording Academy's membership is organized geographically into

twelve “Chapters” nationwide, which serve as regional touchpoints to connect with members and advance the Recording Academy’s mission.

4. The Recording Academy’s headquarters is located at 3030 Olympic Blvd., Santa Monica, California, 90404.

5. Fifteen of the Recording Academy’s executives reside in and work out of California: (i) Chief Executive Officer Harvey Mason jr.; (ii) President Panos A. Panay; (iii) Chief Financial Officer Wayne Zahner; (iv) Chief Operating Officer Branden Chapman; (v) Executive Vice President of Legal Affairs Jennifer Jones; (vi) Vice President of Awards Joanna Chu; (vii) Executive Vice President of Communications Sean Smith, (viii) Vice President of Communications Andie Cox; (ix) Vice President of Producers & Engineers Wing Maureen Droney; (x) Vice President of Membership & Industry Relations Kelley Purcell; (xi) Vice President of Artist Relations Chantel Sausedo; (xii) Vice President of Digital Media Ray Starck; (xiii) Vice President of Production & Event Operations Rex Supa; (xiv) Chief of Staff Michael Kovac; and (xv) Executive Vice President of Marketing John Loken. Twelve of these fifteen executives (all but Smith and Kovac who work fully remotely) maintain an office at the Recording Academy’s Santa Monica headquarters.

6. There are only two executives who reside exclusively in New York: Chief Awards & Industry Officer Ruby Marchand and Vice President of Partnerships & Business Development Rose Polidoro. Marchand also maintains an office at the Santa Monica headquarters. A third executive, John Loken (noted above), whose primary residence is in California, also maintains a secondary residence in New York and splits his time working between California and New York.

7. And the final five Recording Academy executives reside outside of California and New York: I reside in Nebraska; Chief Information Officer David Gregory resides in Ohio; Senior Vice President of Partnerships & Business Development Adam Roth resides in New Jersey; and Chief Advocacy & Public Policy Officer Todd Dupler and Vice President of Diversity, Equity & Inclusion Ryan Butler reside in Washington D.C. Roth and I also maintain offices at the Santa Monica headquarters.

8. Approximately one hundred twenty (120) employees are based out of the Recording Academy's Santa Monica, California headquarters.

9. The majority of the corporate decision-making and direction takes place at the Recording Academy's Santa Monica, California headquarters and within the state of California. The Recording Academy regularly holds national committee meetings, Awards department meetings, and executive team meetings at its Santa Monica headquarters. In addition, the Recording Academy hosts its Trustee meetings biannually in Southern California, with one meeting typically held in the Los Angeles metropolitan area and another in Orange County, California.

10. The Recording Academy's New York Chapter has an office located at 21 E. 37th Street, New York, New York 10016. Only five Recording Academy employees, most of whom are Chapter staff and none of whom are Recording Academy executives, are based out of the New York office.

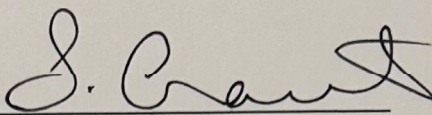
11. There are four elected officers for the Board of Trustees of the Recording Academy. Chair Tammy Hurt resides in the State of Georgia; Vice Chair Dr. Chelsey Green resides in the State of Maryland; Chair Emeritus Christine Albert resides in the State of Texas; and Secretary/Treasurer Gebre Waddell resides in the State of Tennessee.

12. Upon information and belief, Neil Portnow resides and is domiciled in the State of California.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on: January 16, 2024

Elkhorn, NE

A handwritten signature in black ink, appearing to read "S. Grant", is written over a horizontal line.

Shonda Grant